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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARIA MAGDALENA MENDOZA,

Defendant.

Case No. 2:20-cr-00212-GMN-BNW

**Stipulation to Extend Deadlines
Regarding Motion [ECF 44]**

It is hereby stipulated and agreed, by and between Christopher Chiou, Acting United States Attorney, through Simon F. Kung, Assistant United States Attorney, and Brian Pugh, counsel for Defendant Maria Magdalena Mendoza, that (1) the Government's deadline to respond to Defendant's motion filed at ECF 44, currently set for December 17, 2021, be extended to December 20, 2021; and (2) Defendants' deadline to file any reply be extended to December 28, 2021.

This stipulation is entered into for the following reasons:

1 1. On December 3, 2021, Defendant filed a motion to suppress (at ECF 44).
2 Under Local Criminal Rule 12-1(a)(2), the Government's response to this motion would be
3 due on or before December 17, 2021.

4 2. The parties request an extension of the briefing schedule so that the
5 Government has adequate time to respond to the motion filed by Defendant.

6 3. This is the first request for an extension of time regarding the briefing
7 schedule on this motion.

8 4. Because trial is scheduled for February 28, 2022, the granting of this
9 stipulation will not affect the trial date.

10 5. Denial of this request for an extension could result in a miscarriage of justice.

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12 DATED: December 17, 2021

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14 CHRISTOPHER CHIOU
15 Acting United States Attorney
16 /s/ Simon F. Kung
SIMON F. KUNG
Assistant United States Attorney

RENE L. VALLADARES
Federal Public Defender
/s/ BRIAN PUGH
BRIAN PUGH
Counsel for Defendant

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARIA MAGDALENA MENDOZA,

Defendant.

Case No. . 2:20-cr-00212-GMN-BNW

ORDER

[Proposed] Order Granting Stipulation

Based on the pending stipulation of the parties, and good cause appearing, the stipulation is hereby GRANTED.

IT IS HEREBY ORDERED that the deadline for the Government's response to Defendant's motion filed at ECF 44 be extended to December 20, 2021; and

IT IS FURTHER ORDERED that the deadline for any reply by Defendant be extended to December 28, 2021.

IT IS SO ORDERED.

DATED this 20th day of December.


UNITED STATES MAGISTRATE JUDGE